

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

HAWO OSMAN AHMED)

Case No. 3:11-00132
Chief Judge Haynes

EMERGENCY MOTION TO RELOCATE DEFENDANT

COMES NOW Defendant **Hawo Ahmed**, by and through undersigned counsel, and respectfully moves this Honorable Court for the entry of an Order strongly recommending that Defendant Ahmed be returned to a facility within the State of Tennessee.¹ Alternatively, Defendant Ahmed requests her immediate release from custody pending trial.

In support hereof, Defendant Ahmed would state as follows:

1. Defendant Ahmed has been housed continuously at the Correctional Development Center ("CDC") in Nashville, Tennessee since July of 2011. The CDC is approximately a 20 mile and 30 minute roundtrip from downtown Nashville.
2. Yesterday, without warning or explanation, Defendant Ahmed was moved to the Grayson County Detention Facility ("GCDF") in Leitchfield, Kentucky. The GCDF is approximately a 298 mile and 5 hour roundtrip from downtown Nashville.
3. It has generally been The U.S. Marshals practice to move defendants pending trial CLOSER to Nashville rather than isolating them at the farthest facility possible.
4. There is no plausible reason for moving Defendant Ahmed from CDC to GCDF -- particularly at this time. A perceived reason may be that the government has recently revealed the

¹ Undersigned counsel is aware of the limitations of the Court's authority over the U.S. Marshals Office, but would submit that these are certainly extraordinary and extreme circumstances.